CAMERON LAW & POLICY LLC

2550 M Street NW | Suite 343 | Washington DC 20037
US +1 (202) 230 4962 | UK +44 (0)20 7993 2202
M +1 (202) 999 7665 | richard@cameronlawpolicy.com

November 30, 2018

By Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Alaska Communications Internet, LLC, Petition for Partial Waiver of Section 15.407(a)(3) of the Commission's Rules*, ET Docket No. 18-282

Dear Ms. Dortch:

On Wednesday, November 28, 2018, Leonard Steinberg, General Counsel of Alaska Communications, and Karen Brinkmann and myself, both outside counsel to Alaska Communications, met with Aspasia Paroutsas, Jamison Prime, Karen Rackley, and Hugh VanTuyl of the Office of Engineering and Technology regarding the above-referenced waiver request filed by Alaska Communications Internet, LLC.

In the meeting, we discussed the commitment Alaska Communications has made to use federal Connect America Fund ("CAF") Phase II support to deploy broadband Internet access service to over 31,000 customer locations in high-cost and remote areas not otherwise served by any other competitor. We explained that a waiver of Section 15.407(a)(3) would help the company meet that commitment in the context of the unique deployment challenges present in rural and remote Alaska. These challenges include a lack of access to basic infrastructure, such as radio towers and middle mile backhaul, that limit the range of deployment options available for fixed wireless service. In addition, because of the uniquely sparse population in the areas Alaska Communications has committed to serve, it is logistically daunting and economically infeasible to construct new towers, even with substantial federal financial support. We also explained the substantial public interest benefits to be gained from this waiver, because it will enable approximately 500 additional unserved customer locations to receive new broadband service that will not otherwise receive it for the foreseeable future.

We also explained that, contrary to the concerns of certain commenters, interference issues are unlikely to arise as a result of this waiver. To the knowledge of Alaska Communications, the locations it proposes to serve in the Chena/Pleasant Valley area are well clear of the Fairbanks service area of AlasConnect. Furthermore, we pointed out that Alaska Communications will deploy RADWIN fixed wireless base station radios that form only *sequential* directional point-to-point beams, not *simultaneous*. RADWIN has filed a study showing that these sequential directional beams are actually more narrowly focused, and less likely to cause interference, than the directional point-to-point beams for which the FCC

originally developed the power limits in Section 15.407(a)(3).[1] To the extent that any interference should arise, Alaska Communications will, of course, work cooperatively to address the issue.

Finally, during the meeting, the OET staff raised certain questions, to which Alaska Communications has committed to respond. While today's earthquake in Anchorage, Alaska, has prevented us from including complete responses in this letter, we will provide the requested information as quickly as possible.

Please direct any questions regarding this matter to me.

Very truly yours,

Digitally signed by Richard R. Cameron
Date: 2018.11.30 22:17:34 -05'00'

Richard R. Cameron
Counsel to Alaska Communications

cc: Aspasia Paroutsas
Jamison Prime
Karen Rackley
Michael Ha
Hugh VanTuyl

[1] *RADWIN Ltd. Amendment of Part 15 of the Commission's Rules to Advance Improved Broadband Services in the U-NII-1 and U-NII-3 Bands*, Petition for Rulemaking, RM No. 11812 (filed June 18, 2018) ("RADWIN Petition"), Appendix B at 7 ("1. Being non-directional, and despite the EIRP limitations, the legacy point-to-multipoint base station with the sectorial 90 degrees antenna generates the highest levels of interference and always creates more interference than the same point-to-multipoint base station operating with a multiple directional beam antenna, even when the latter operates at the higher EIRP requested in the Petition for Rulemaking (i.e., the EIRP allowed for point-to-point operations). 2. The point-to-multipoint base station with multiple directional beam technology does not generate higher interference levels than a point-to-point base station operating with a directional antenna, even if the former is allowed to operate at the higher EIRP level requested in the Petition for Rulemaking (i.e., the EIRP allowed for point-to-point operations). 3. The point-to-multipoint base station when using a multiple directional beam antenna generates the least amount of interference to nearby receivers even when operated at the EIRP level requested in the Petition for Rulemaking (i.e., the EIRP allowed for point-to-point operations) when compared to point-to-point base stations using directional antennas or point-to-multipoint base stations using wide-beam sectorial antennas.").